

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
NORTHERN DIVISION**

**JOHNATHAN YASEVICH, et al., Each
Individually and on Behalf of All Others Similarly
Situated**

PLAINTIFFS

CASE NO. 3:20-cv-19-KGB

**THE HERITAGE COMPANY, INC.,
and SANDRA FRANECKE**

DEFENDANTS

MOTION FOR CONTINUANCE

COMES NOW Defendants, The Heritage Company, Inc. (hereinafter referred to as “THC”) and Sandra Franecke (hereinafter referred to as “Franecke”) and sometimes collectively referred to as “Defendants”, by and through their attorneys, the Davidson Law Firm, and for their Motion for Continuance, state:

1. That this matter is set for trial the week of August 7, 2023.
2. That after conferring with opposing counsel and the Court staff regarding pending motions and the potential need for further discovery, the parties believe it is in the best interest of justice that this matter be continued.
3. That Local Rule 7.5 of the United States District Court for the Eastern District of Arkansas states that in no case will an agreement by counsel for a continuance be recognized except by consent of the Court.
4. That the parties believe they have demonstrated good cause and believe the Court should consent to the continuance. That the parties have also conferred on potential new dates for the trial to occur and have provided these dates to the Court.

WHEREFORE, the Defendants pray that the Court grant their Motion for Continuance;
and for all other just and proper relief to which they are entitled.

Respectfully submitted,

Charles Darwin "Skip" Davidson; ABN 73026
Nickolas W. Dunn, ABN 2019115

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I, Nickolas W. Dunn, do hereby certify that I have sent via:

- ☐ Hand Delivery
- ☐ Telefax
- ☐ Electronic mail
- ☐ U.S. Mail
- ☐ U.S. Mail, Certified, Return Receipt (as noted below)
- ☐ STATE CM/ECF System
- ☒ Federal Court ECF System (as noted below)

this 14th day of **July 2023**, a true and complete copy of the forgoing to the following individuals:

Josh Sanford

Daniel Ford

SANFORD LAW FIRM, PLLC

650 S. Shackleford, Suite 411

Little Rock, Arkansas 72211

Nickolas W. Dunn